

REQUIRED STATEMENT TO ACCOMPANY
ALL MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s) Peter A Renkens Case No. 19-27996 Chapter 13

NewRez LLC d/b/a Shellpoint Mortgage
Servicing as the servicing agent for Wilmington
Savings Fund Society, FSB, not in its individual
capacity but solely as owner trustee for
Deephaven Residential Mortgage Trust 2019-1

All Cases: Moving Creditor Deephaven Residential Mortgage Trust 2019-1 Date Case Filed 10/2/2019

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing 12/6/2019 Or Date Plan Confirmed 01/31/2020

Chapter 7: ☐ No-Asset Report Filed on _____

☐ No-Asset Report not filed, Date of Creditors Meeting 11/4/2019

1. Collateral

a. ☒ Home

b. ☐ Car Year, Make, and Model _____

c. ☐ Other (describe) _____

2. Balanced Owed as of April 22, 2020 \$170,657.39, principal balance, \$187,579.57 payoff balance

Total of all other Liens against Collateral _____

3. In Chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition:
Attached as Exhibit D

4. Estimated Value of Collateral (must be supplied in *all* cases) \$259,000.00 based on Debtors Schedule A/B

5. Default

a. ☐ Pre-Petition Default

Number of months _____ Amount _____

b. ☒ Post-Petition Default

i. ☒ On direct payments to the moving creditor

Number of months 4 Amount \$8,686.64

ii. ☐ On payments to the Standing Chapter 13 Trustee

Number of Months _____ Amount _____

6. Other Allegations

a. ☐ Lack of Adequate Protection § 362(d)(1)

i. ☐ No insurance

ii. ☐ Taxes unpaid Amount \$

iii. ☐ Rapidly depreciating asset

iv. ☐ Other (describe) _____

b. ☐ No Equity and not Necessary for an Effective reorganization § 362(d)(2)

c. ☐ Other "Cause" § 362(d)(1)

i. ☐ Bad Faith (describe) _____

ii. ☐ Multiple Filings

iii. ☐ Other (describe) _____

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☒ No Statement of Intention Filed

Date: May 12, 2020 /s/ Josephine J. Miceli

Counsel for Movant